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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

CALIFORNIA SERVICE EMPLOYEES
HEALTH & WELFARE TRUST FUND,
MIKE GARCIA, Trustee, CHARLES
GILCHRIST, Trustee, RAYMOND C. NANN,
Trustee, LARRY T. SMITH, Trustee,

Plaintiffs,

vs.

A & B MAINTENANCE, INC., a California
corporation,

Defendant.

Case No.: C 07-04945 TEH

**REDACTED VERSION OF THE
DECLARATION OF CRYSTAL
SHANKS IN SUPPORT OF
PLAINTIFFS' MOTION FOR PARTIAL
JUDGMENT BY DEFAULT**

Date: January 7, 2008
Time: 10:00 a.m.
Judge: Hon. Thelton E. Henderson
Courtroom 12, 19th Floor

I, Crystal Shanks, state:

1. I am an Assistant Vice President and Department Head of the Employer Accounting Department for Associated Third Party Administrators which is employed by Plaintiff California Service Employees Health & Welfare Trust Fund ("Trust") to administer, among other things, the Trust's health and welfare plan and act as liaison between the Trust and its covered members and their employers signatory to collective bargaining agreements. I direct a staff which records and maintains monthly reports from employers of hours worked by their covered employees and of contributions due from each contributing employer. Under my direction, my department maintains records of payments received by contributing employers, and calculates and

1 bills employers for liquidated damages and interest due under the Trust Agreement and under the
2 collection policy of the Fund for monthly delinquencies. (See Exhibits A-C to the Declaration of
3 Philip M. Miller filed herewith). My department obtains and retains collective bargaining
4 agreements between contributing employers and local unions affiliated with the Trust which create
5 the employer's obligation to contribute to the Fund. The data are recorded close in time to the
6 events to which they pertain and are created and maintained in the ordinary course of business of
7 the Trust.
8

9 2. My department has on file the Maintenance Contractors Market Agreement
10 between Defendant A & B Maintenance, Inc. ("A & B") and Local 1877 California Service
11 Employees International Union ("Local 1877") for the period March 1, 2001 through February 28,
12 2005, and the Memorandum of Agreement between A & B and Local 1877, effective October 3,
13 2005. (See Exhibits A, and B, respectively, to the Declaration of Adolfo Gamez filed herewith).
14

15 3. According to our records and from records provided to us by Local 1877, (see
16 Exhibit D to Declaration of Adolfo Gamez filed herewith), A & B has failed to submit monthly
17 reports for all of its covered employees and to pay contributions due on their behalf for hours
18 worked during the period October 2005 through May 2006. Attached hereto as Exhibit A is a
19 collective report of contributions submitted by A & B for the period November 2005 through May
20 2006. Further, A & B has failed to submit monthly reports of covered employees, or to pay
21 contributions due on their behalf, for the period May 2007 through October 2007. Under my
22 direction, a report entitled "A and B Maintenance Account #01300 Unpaid Employee List for the
23 Period October 2005 through October 2007 Hours" was compiled in order to identify employees
24 of A & B who have not been reported, but are covered under the Agreements. A true and correct
25 copy of the list is attached hereto as Exhibit B.
26

27 / / /
28

I declare under penalty of perjury that the foregoing is true and correct and if called upon as a witness, I could testify to the foregoing on the basis of my personal, direct knowledge.

Crystal Shanks
CRYSTAL SHANKS

PROOF OF SERVICE

I am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to this action. My business address is 120 Howard Street, Suite 520, San Francisco, California 94105.

On November 30, 2007, I served the following documents on the parties to this action, addressed as follows, in the manner described below:

**DECLARATION OF CRYSTAL SHANKS IN SUPPORT
OF PLAINTIFFS' MOTION FOR PARTIAL JUDGMENT BY DEFAULT**

XX MAIL, being familiar with the practice of this office for the collection and the processing of correspondence for mailing with the United States Postal Service, and deposited in the United States Mail copies of the same to the business addresses set forth below, in a sealed envelope fully prepared.

Addressed to:

A & B Maintenance, Inc.
405 East Gardena Blvd., Suite A
Gardena, CA 90247

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 30th day of November, 2007 at San Francisco, California.

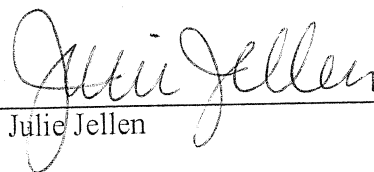

Julie Jellen

EXHIBIT A

TO DECLARATION OF

CRYSTAL SHANKS

IN SUPPORT OF PLAINTIFFS' MOTION

FOR PARTIAL JUDGMENT BY DEFAULT

AIRA

7/7/06

A&BMAINTENANCE, INC.
405 E. Gardena Blvd. Suite #A
Gardena, CA 90247
Ph: 310-768-1458

CALIFORNIA SERVICE EMPLOYEE HEALTH AND WELFARE
TRUST FUND
CONTRIBUTION REPORT

EMPLOYEE ID	UNION EMPLOYEES'	STORE #	PAY RATE	START DATE	TERMINATED	CONTRIBUTION NOV.- DEC. 05 TO JAN THRU MAY 06
8765	ARENAS, TRINDAD	632	10.25	10/18/05	5/15/06	3,991.40
7113	MORALES, ARRON	632	10.25	10/18/05		3,991.40
TOTAL:						MEDICAL INS. PMT. 7,982.80

MANAGER SIGNATURE: _____

EXHIBIT A

EXHIBIT B

TO DECLARATION OF

CRYSTAL SHANKS

IN SUPPORT OF PLAINTIFFS' MOTION

FOR PARTIAL JUDGMENT BY DEFAULT

A and B MAINTENANCE ACCOUNT #01300
UNPAID EMPLOYEE LIST FOR PERIOD OCTOBER 2005 THROUGH OCTOBER 2007 HOURS

WORK MONTH	LAST NAME	FIRST NAME	SSN	H&W AMOUNT DUE	COMMENTS
OCTOBER 2005	ARENAS	TRINIDAD	xxx-xx-8765	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
OCTOBER 2005	MORALES	AARON	xxx-xx-7113	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
				\$ 1,140.40	
NOVEMBER 2005	ARENAS	TRINIDAD	xxx-xx-8765	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
NOVEMBER 2005	MORALES	AARON	xxx-xx-7113	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
				\$ 1,140.40	
DECEMBER 2005	ARENAS	TRINIDAD	xxx-xx-8765	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
DECEMBER 2005	MORALES	AARON	xxx-xx-7113	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
				\$ 1,140.40	
JANUARY 2006	ARENAS	TRINIDAD	xxx-xx-8765	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
JANUARY 2006	MORALES	AARON	xxx-xx-7113	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
				\$ 1,140.40	
FEBRUARY 2006	ARENAS	TRINIDAD	xxx-xx-8765	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
FEBRUARY 2006	FLORES	AURELIO	xxx-xx-1063	\$ 570.20	PER LIST PROVIDED BY SEIU
FEBRUARY 2006	MORALES	AARON	xxx-xx-7113	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
				\$ 1,710.60	
MARCH 2006	ARENAS	TRINIDAD	xxx-xx-8765	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
MARCH 2006	FLORES	AURELIO	xxx-xx-1063	\$ 570.20	PER LIST PROVIDED BY SEIU
MARCH 2006	MORALES	AARON	xxx-xx-7113	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
				\$ 1,710.60	
APRIL 2006	ARENAS	TRINIDAD	xxx-xx-8765	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
APRIL 2006	FLORES	AURELIO	xxx-xx-1063	\$ 570.20	PER LIST PROVIDED BY SEIU
APRIL 2006	MORALES	AARON	xxx-xx-7113	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
				\$ 1,710.60	
MAY 2006	ARENAS	TRINIDAD	xxx-xx-8765	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
MAY 2006	FLORES	AURELIO	xxx-xx-1063	\$ 570.20	PER LIST PROVIDED BY SEIU
MAY 2006	MORALES	IVAN	xxx-xx-4330	\$ 570.20	PER LIST PROVIDED BY SEIU
MAY 2006	MORALES	AARON	xxx-xx-7113	\$ 570.20	PER LIST PROVIDED BY EMPLOYER
				\$ 2,280.80	

EXHIBIT B

A and B MAINTENANCE ACCOUNT #01300
UNPAID EMPLOYEE LIST FOR PERIOD OCTOBER 2005 THROUGH OCTOBER 2007 HOURS

WORK MONTH	LAST NAME	FIRST NAME	SSN	H&W AMOUNT DUE	COMMENTS
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JUNE 2006 THROUGH APRIL 2007 HOURS - CONTRIBUTIONS PAID

MAY 2007	ALVAREZ	BERNARDO	xxx-xx-7561	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	AMARALES	DAVID	xxx-xx-1324	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	AYALA	ANTONIO	xxx-xx-8863	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	CABRERA	JESUS	xxx-xx-8991	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	GOMEZ-VELAZQUEZ	MARIO	xxx-xx-7889	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	HERNANDEZ	MARCIANO	xxx-xx-5936	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	HERNANDEZ-NAVA	EDGAR	xxx-xx-7564	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	JONES	ELLIOTT	xxx-xx-1701	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	LITTLE	DORNELL	xxx-xx-4594	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	LUCERO	JAVIER	xxx-xx-9662	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	MEZA	PEDRO	xxx-xx-7123	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	MORALES	AARON	xxx-xx-7113	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	MORALES	IVAN	xxx-xx-4330	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	REYES	AIDE	xxx-xx-8900	\$ 579.80	PER LIST PROVIDED BY SEIU
MAY 2007	TURRUBIARTES (FLORES)	AURELIO	xxx-xx-1063	\$ 579.80	PER LIST PROVIDED BY SEIU
				\$ 8,697.00	

JUNE 2007	ALVAREZ	BERNARDO	xxx-xx-7561	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	AMARALES	DAVID	xxx-xx-1324	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	AYALA	ANTONIO	xxx-xx-8863	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	CABRERA	JESUS	xxx-xx-8991	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	GOMEZ-VELAZQUEZ	MARIO	xxx-xx-7889	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	HERNANDEZ	MARCIANO	xxx-xx-5936	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	HERNANDEZ-NAVA	EDGAR	xxx-xx-7564	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	JONES	ELLIOTT	xxx-xx-1701	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	LITTLE	DORNELL	xxx-xx-4594	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	LUCERO	JAVIER	xxx-xx-9662	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	MEZA	PEDRO	xxx-xx-7123	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	MORALES	AARON	xxx-xx-7113	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	MORALES	IVAN	xxx-xx-4330	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	REYES	AIDE	xxx-xx-8900	\$ 579.80	PER LIST PROVIDED BY SEIU
JUNE 2007	TURRUBIARTES (FLORES)	AURELIO	xxx-xx-1063	\$ 579.80	PER LIST PROVIDED BY SEIU
				\$ 8,697.00	

JULY 2007	ALVAREZ	BERNARDO	xxx-xx-7561	\$ 579.80	PER LIST PROVIDED BY SEIU
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A and B MAINTENANCE ACCOUNT #01300
UNPAID EMPLOYEE LIST FOR PERIOD OCTOBER 2005 THROUGH OCTOBER 2007 HOURS

WORK MONTH	LAST NAME	FIRST NAME	SSN	H&W AMOUNT DUE	COMMENTS
JULY 2007	AMARALES	DAVID	xxx-xx-1324	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	AYALA	ANTONIO	xxx-xx-8863	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	CABRERA	JESUS	xxx-xx-8991	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	GOMEZ-VELAZQUEZ	MARIO	xxx-xx-7889	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	HERNANDEZ	MARCIANO	xxx-xx-5936	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	HERNANDEZ-NAVA	EDGAR	xxx-xx-7564	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	JACKSON	MARZETTE	xxx-xx-5011	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	JONES	ELLIOTT	xxx-xx-1701	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	LITTLE	DORNELL	xxx-xx-4594	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	LUCERO	JAVIER	xxx-xx-9662	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	MEZA	PEDRO	xxx-xx-7123	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	MORALES	AARON	xxx-xx-7113	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	MORALES	IVAN	xxx-xx-4330	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	REYES	NEREO	xxx-xx-1809	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	REYES	AIDE	xxx-xx-8900	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	SALOMON	FERNANDO	xxx-xx-5763	\$ 579.80	PER LIST PROVIDED BY SEIU
JULY 2007	TURRUBIARTES (FLORES)	AURELIO	xxx-xx-1063	\$ 579.80	PER LIST PROVIDED BY SEIU
				\$ 10,436.40	
AUGUST 2007	ALVAREZ	BERNARDO	xxx-xx-7561	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	AMARALES	DAVID	xxx-xx-1324	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	AYALA	ANTONIO	xxx-xx-8863	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	BADILLO	CELINA	xxx-xx-4829	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	BELTRAN	MARVIN	xxx-xx-2549	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	CABRERA	JESUS	xxx-xx-8991	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	GOMEZ-VELAZQUEZ	MARIO	xxx-xx-7889	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	HERNANDEZ	MARCIANO	xxx-xx-5936	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	HERNANDEZ-NAVA	EDGAR	xxx-xx-7564	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	JACKSON	MARZETTE	xxx-xx-5011	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	JONES	ELLIOTT	xxx-xx-1701	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	LITTLE	DORNELL	xxx-xx-4594	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	LUCERO	JAVIER	xxx-xx-9662	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	MEZA	PEDRO	xxx-xx-7123	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	MORALES	AARON	xxx-xx-7113	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	MORALES	IVAN	xxx-xx-4330	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	QUIROS	DELIA	xxx-xx-6738	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	REYES	NEREO	xxx-xx-1809	\$ 579.80	PER LIST PROVIDED BY SEIU

A and B MAINTENANCE ACCOUNT #01300
UNPAID EMPLOYEE LIST FOR PERIOD OCTOBER 2005 THROUGH OCTOBER 2007 HOURS

WORK MONTH	LAST NAME	FIRST NAME	SSN	H&W AMOUNT DUE	COMMENTS
AUGUST 2007	REYES	AIDE	xxx-xx-8900	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	SALOMON	FERNANDO	xxx-xx-5763	\$ 579.80	PER LIST PROVIDED BY SEIU
AUGUST 2007	TURRUBIARTES (FLORES)	AURELIO	xxx-xx-1063	\$ 579.80	PER LIST PROVIDED BY SEIU
				12,175.80	
SEPTEMBER 2007	ALVAREZ	BERNARDO	xxx-xx-7561	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	ALVAREZ	CIRIACA	xxx-xx-5320	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	AMARALES	DAVID	xxx-xx-1324	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	AYALA	ANTONIO	xxx-xx-8863	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	BADILLO	CELINA	xxx-xx-4829	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	BELTRAN	MARVIN	xxx-xx-2549	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	CABRERA	JESUS	xxx-xx-8991	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	GOMEZ-VELAZQUEZ	MARIO	xxx-xx-7889	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	HERNANDEZ	MARCIANO	xxx-xx-5936	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	HERNANDEZ-NAVA	EDGAR	xxx-xx-7564	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	JACKSON	MARZETTE	xxx-xx-5011	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	JONES	ELLIOTT	xxx-xx-1701	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	LITTLE	DORNELL	xxx-xx-4594	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	LUCERO	JAVIER	xxx-xx-9662	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	MEZA	PEDRO	xxx-xx-7123	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	MORALES	AARON	xxx-xx-7113	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	MORALES	IVAN	xxx-xx-4330	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	QUIROS	DELIA	xxx-xx-6738	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	REYES	NEREO	xxx-xx-1809	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	REYES	AIDE	xxx-xx-8900	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	SALOMON	FERNANDO	xxx-xx-5763	\$ 579.80	PER LIST PROVIDED BY SEIU
SEPTEMBER 2007	TURRUBIARTES (FLORES)	AURELIO	xxx-xx-1063	\$ 579.80	PER LIST PROVIDED BY SEIU
				12,755.60	
OCTOBER 2007	ALVAREZ	BERNARDO	xxx-xx-7561	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	ALVAREZ	CIRIACA	xxx-xx-5320	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	AMARALES	DAVID	xxx-xx-1324	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	AYALA	ANTONIO	xxx-xx-8863	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	BADILLO	CELINA	xxx-xx-4829	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	BELTRAN	MARVIN	xxx-xx-2549	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	CABRERA	JESUS	xxx-xx-8991	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	GOMEZ-VELAZQUEZ	MARIO	xxx-xx-7889	\$ 579.80	PER LIST PROVIDED BY SEIU

A and B MAINTENANCE ACCOUNT #01300
UNPAID EMPLOYEE LIST FOR PERIOD OCTOBER 2005 THROUGH OCTOBER 2007 HOURS

WORK MONTH	LAST NAME	FIRST NAME	SSN	H&W AMOUNT DUE	COMMENTS
OCTOBER 2007	HERNANDEZ	MARCIANO	xxx-xx-5936	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	HERNANDEZ-NAVA	EDGAR	xxx-xx-7564	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	JACKSON	MARZETTE	xxx-xx-5011	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	JIMENEZ	MARIA	xxx-xx-5432	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	JONES	ELLIOTT	xxx-xx-1701	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	LITTLE	DORNELL	xxx-xx-4594	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	LUCERO	JAVIER	xxx-xx-9662	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	MEZA	PEDRO	xxx-xx-7123	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	MORALES	AARON	xxx-xx-7113	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	MORALES	IVAN	xxx-xx-4330	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	QUIROS	DELIA	xxx-xx-6738	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	REYES	NEREO	xxx-xx-1809	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	REYES	AIDE	xxx-xx-8900	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	SALOMON	FERNANDO	xxx-xx-5763	\$ 579.80	PER LIST PROVIDED BY SEIU
OCTOBER 2007	TURRUBIARTES (FLORES)	AURELIO	xxx-xx-1063	\$ 579.80	PER LIST PROVIDED BY SEIU
				\$ 13,335.40	

EXHIBIT C

TO DECLARATION OF

CRYSTAL SHANKS

IN SUPPORT OF PLAINTIFFS' MOTION

FOR PARTIAL JUDGMENT BY DEFAULT

CALIFORNIA SERVICE EMPLOYEES HEALTH and WELFARE TRUST FUND
A and B MAINTENANCE, INC, ACCOUNT #01300
DELINQUENCIES FOR PERIOD OCTOBER 2005 THROUGH OCTOBER 2007 HOURS

WORK MONTH	PAYMENT DUE DATE	END DATE OF INTEREST CALCULATION OR DATE OF RECEIPT OF CONTRIBUTIONS	NO. OF DAYS LATE	NO. OF EMPLOYEES	CONTRIBUTION RATE	ESTIMATED OUTSTANDING CONTRIBUTIONS	ESTIMATED OR ACTUAL LIQUIDATED DAMAGES	ESTIMATED OR ACTUAL INTEREST	ESTIMATED OR ACTUAL TOTALS
Oct 2005	11/20/05	11/30/07	730	2	\$570.20	\$1,140.40	\$200.00	\$228.08	\$1,568.48
Nov 2005	12/20/05	11/30/07	700	2	\$570.20	\$1,140.40	\$200.00	\$218.70	\$1,559.10
Dec 2005	01/20/06	11/30/07	670	2	\$570.20	\$1,140.40	\$200.00	\$209.33	\$1,549.73
Jan 2006	02/20/06	11/30/07	640	2	\$570.20	\$1,140.40	\$200.00	\$199.96	\$1,540.36
Feb 2006	03/20/06	11/30/07	610	3	\$570.20	\$1,710.60	\$200.00	\$285.88	\$2,196.48
Mar 2006	04/20/06	11/30/07	580	3	\$570.20	\$1,710.60	\$200.00	\$271.82	\$2,182.42
Apr 2006	05/20/06	11/30/07	550	3	\$570.20	\$1,710.60	\$200.00	\$257.76	\$2,168.36
May 2006	06/20/06	11/30/07	520	4	\$570.20	\$2,280.80	\$200.00	\$324.93	\$2,805.73
Jun 2006	07/20/06	07/20/06	0	12	\$570.20	PAID	\$0.00	\$0.00	\$0.00
Jul 2006	08/20/06	10/20/06	60	12	\$570.20	PAID	\$342.11	\$123.72	\$465.83
Aug 2006	09/20/06	10/20/06	30	13	\$570.20	PAID	\$370.63	\$73.11	\$443.74
Sep 2006	10/20/06	01/06/07	76	10	\$570.20	PAID	\$285.10	\$118.72	\$403.82
Oct 2006	11/20/06	03/23/07	123	4	\$570.20	PAID	\$200.00	\$76.85	\$276.85
Nov 2006	12/20/06	03/23/07	93	5	\$570.20	PAID	\$200.00	\$72.64	\$272.64
Dec 2006	01/20/07	03/23/07	63	5	\$570.20	PAID	\$200.00	\$49.20	\$249.20
Jan 2007	02/20/07	04/26/07	66	4	\$570.20	PAID	\$200.00	\$41.24	\$241.24
Feb 2007	03/20/07	04/26/07	36	4	\$570.20	PAID	\$200.00	\$22.49	\$222.49
Mar 2007	04/20/07	04/26/07	6	4	\$570.20	PAID	\$200.00	\$3.74	\$203.74
Apr 2007	05/20/07	07/17/07	57	5	\$570.20	PAID	\$200.00	\$45.27	\$245.27
May 2007	06/20/07	11/30/07	160	15	\$579.80	\$8,697.00	\$434.85	\$381.23	\$9,513.08
Jun 2007	07/20/07	11/30/07	130	15	\$579.80	\$8,697.00	\$434.85	\$309.75	\$9,441.60
Jul 2007	08/20/07	11/30/07	100	18	\$579.80	\$10,436.40	\$521.82	\$285.92	\$11,244.14
Aug 2007	09/20/07	11/30/07	70	21	\$579.80	\$12,175.80	\$608.79	\$233.50	\$13,018.09
Sep 2007	10/20/07	11/30/07	40	22	\$579.80	\$12,755.60	\$637.78	\$139.78	\$13,533.16
Oct 2007	11/20/07	11/30/07	10	23	\$579.80	\$13,335.40	\$666.77	\$36.53	\$14,038.70
TOTALS						\$78,071.40	\$7,302.70	\$4,010.15	\$89,384.25

ESTIMATED TOTAL DUE

89,384.25

EXHIBIT C